

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

WILLIAM E. DUGAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 08 C 2651
)	
ROCKFORD BLACKTOP)	JUDGE AMY J. ST. EVE
CONSTRUCTION CO., an Illinois)	
corporation, f/k/a ROCKFORD)	MAGISTRATE MARTIN C. ASHMAN
BLACKTOP, INC., a Nevada corporation,)	
)	
Defendant.)	

PARTIES' JOINT PROPOSED DISCOVERY DEADLINE

Plaintiffs, WILLIAM E. DUGAN, *et al.*, by and through their attorneys, Baum Sigman Auerbach & Neuman, Ltd., and Defendant, ROCKFORD BLACKTOP CONSTRUCTION CO., an Illinois corporation, f/k/a ROCKFORD BLACKTOP, INC., a Nevada corporation, by and through its attorneys, Hinshaw & Culbertson, LLP, hereby file this Parties' Joint Proposed Discovery Deadline for consideration by the Court:

1. The Parties' Rule 26(a)(1) Disclosures will be provided on or before August 11, 2008, pursuant to the Court's Order entered on June 23, 2008.
2. Fact discovery to be completed by October 30, 2008.
3. Dispositive motions to be filed by December 15, 2008.

4. At this time, the parties respectfully request that the Court allow the parties to enter a pre-trial order date at a later time.

Respectfully submitted,

/s/ Cecilia M. Scanlon

One of the attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed Parties' Proposed Discovery Deadline with the Clerk of Court using the CM/ECF system which will send an e-mail notification of such filing to:

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and further certifies that she mailed the document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 4th day of August 2008:

Jonathan Hoag
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/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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